

Exhibit A

Subject: MyChoice v Taiv - Follow-Up Meet and Confer re Document Requests and Source Code Review
Date: Thursday, September 19, 2024 at 12:51:01 PM Pacific Daylight Time
From: Chris Perque
To: Ryan Marton, Michael Gilleran, Phil Haack
CC: Hector Ribera

Ryan,

Are you available for a call at 10 am PT on Monday or Tuesday of next week to discuss open discovery issues?

The open issues are Taiv Inc. and Taiv USA, Inc.'s failure to produce relevant documents. Taiv was required to produce technical documents and other relevant documents long ago under the local rules and orders entered in this case but failed to comply. MyChoice served document requests on Taiv and Taiv USA to identify categories of relevant documents for production, and neither entity produced documents in response thereto. In the last discovery call, counsel for Taiv was not prepared to discuss those requests. We intend to address those requests and other failures of Taiv to produce documents as required under the local rules and applicable orders in this case during the call next week.

The other open discovery issue is the protocol/location for reviewing Taiv's source code. MyChoice objects to the production of that code and requirement to conduct an in-person review at your offices in San Francisco as unduly burdensome. During our last call, MyChoice requested the option to remotely reviewing that code, and counsel for Taiv responded that MyChoice would have to cover the cost of a remote review, which may exceed \$6000 per month for unspecified hosting costs. MyChoice has since conferred with a consultant, who had conducted remote source code reviews in other cases using TeamViewer, which could be conducted with no additional hosting cost. The protocol would be that a free version of TeamViewer would be installed on the computer with Taiv's source code stored thereon by someone in your office. MyChoice via an external consultant would request that someone with access to that computer turn it on at a particular date/time, open TeamViewer, and provide an access code from TeamViewer for the consultant to use to access the computer and review source code on that day. The consultant would advise when the review was completed on that day so that the computer could be turned off. This process has been used in other matters as an effective, efficient manner to review code stored on a local computer. We can discuss this further during the upcoming call.

Best,
Chris

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